

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

AMERICAN RE-INSURANCE COMPANY,	)	
et al.,	)	
Plaintiffs,	)	CIVIL ACTION NO: 05-11840-MLW
	)	
v.	)	
	)	
AMERICAN INTERNATIONAL GROUP	)	
and TRENWICK AMERICA	)	
REINSURANCE CORPORATION,	)	
Defendants.	)	

**ASSENTED TO MOTION TO FILE UNDER SEAL  
PLAINTIFFS' MEMORANDUM IN OPPOSITION TO THE RENEWED MOTIONS OF  
DEFENDANTS AIG INC. AND TRENWICK TO STAY PROCEEDINGS  
PENDING ARBITRATION**

Plaintiffs American Re-Insurance Company, et al. hereby move to file under seal the following pleading:

- **PLAINTIFFS' MEMORANDUM IN OPPOSITION TO THE RENEWED  
MOTIONS OF DEFENDANTS AIG INC. AND TRENWICK TO STAY  
PROCEEDINGS PENDING ARBITRATION**

Plaintiffs respectfully request permission to file this pleading under seal because it attaches and references material submitted in connection with a confidential arbitration to which the Plaintiffs are a party. In accordance with the Local Rules, Plaintiffs respectfully request that this pleading be impounded until the final resolution of this litigation between the parties, at which time it will be retrieved by Plaintiffs' counsel.

WHEREFORE, it is respectfully requested that the Court grant this assented-to motion to file the above-described document under seal.

**Certification Pursuant to Local Rule 7.1**

Plaintiffs' counsel certifies that pursuant to Local Rule 7.1, counsel for defendants have conferred regarding the issue presented by this motion, and Plaintiffs' counsel assented to this motion.

Respectfully submitted,

/s/ Steven L. Schreckinger  
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Dated: February 2, 2006

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail on February 2, 2006.

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Anne Robbins

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